

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

----- In re:  CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al., <sup>1</sup>  <div style="text-align: center;">Debtors.</div> -----	x : : : : : : : : v	Chapter 11 Case No. 24-12534 (JKS)  (Jointly Administered)
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**AMENDED<sup>2</sup> NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR  
HEARING ON JULY 8, 2025 AT 11:00 A.M. (ET)<sup>3</sup>**

**THIS HEARING HAS BEEN CANCELLED.**

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

<sup>2</sup> All amendments are highlighted in **Bold**.

<sup>3</sup> All motions and other pleadings referenced herein are available online at the following web address:  
<https://dm.epiq11.com/CarePoint>

**I. CONTINUED MATTERS**

1. Motion of Saint Peter's University Hospital for an Order (A) Granting Request for Allowance and Payment of Administrative Expense Claim and (B) Fixing Deadline for the Debtors to Assume or Reject Exclusive Services Agreement or, in the Alternative, Granting Relief from the Automatic Stay [Filed: 12/13/2024; D.I. [300](#)].

Related Documents: None.

Objection Deadline: December 27, 2024 at 4:00 p.m. (ET)

Objections Received:

- A. Debtors' Limited Objection to Saint Peter's University Hospital's Motion for Entry of an Order (A) Granting Request for Allowance and Payment of Administrative Expense Claim and (B) Fixing Deadline for the Debtors to Assume or Reject Exclusive Services Agreement or, in the Alternative, Granting Relief from the Automatic Stay [Filed: 12/27/2024; D.I. [372](#)].

Status: The parties have agreed to continue this matter to August 14, 2025.

2. Motion of Access Information Management Corporation (I) to Compel (A) Debtors' Assumption of Executory Contracts, or Alternatively, (B) Debtors to Provide Direction as Required by the Contracts and Applicable Law with Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the contracts, (II) For Relief from the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/17/2024; D.I. [320](#)].

Related Documents:

- A. Access Information Management Corporation's Reply in Response to Debtors' Objection to and In Further Support of Its Motion to Compel and for Related Relief [Filed: 02/07/2025; D.I. [660](#)].
- B. Supplement to Motion of Access Information Management Corporation's Motion to Compel [Filed: 02/28/2025; D.I. [781](#)].

Objection Deadline: December 31, 2024 at 4:00 p.m. (ET)

Objections Received:

- C. Debtors' Objection To Access Management Information Management Corporation's Motion (I) to Compel (a) Debtors' Assumption of Executory Contracts, or Alternatively, (b) Debtors to Provide Direction as Required by

the Contracts and Applicable Law With Respect to the Continued Storage, Transfer, Destruction or Other Disposition of the Health Care Related Documents and Information Subject to the Contracts, (II) For Relief From the Automatic Stay, and (III) for Such Other Relief as is Necessary Under the Circumstances [Filed: 12/31/2024; D.I. [381](#)].

Status: This matter has been resolved through a Stipulation with respect to rejection of the Access contracts, which stipulation has been approved by the Court at D.I. 1382.

- 3.** Debtors' Second Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 02/18/2025; D.I. [708](#)].

Related Documents:

- A. Order Approving Debtors' Second Omnibus Motion for Entry of an Order, Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code, Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases Effective as of the Rejection Date [Filed: 04/07/2025; D.I. [1092](#)].
- B. Order Approving Stipulation By and Between the Debtors and Access Information Management Corporation [Filed: 07/01/2025; D.I. [1382](#)].

Objection Deadline: March 4, 2025 at 4:00 p.m.

Responses:

- C. Objection and Reservation of Rights of Access Information Management Corporation to Debtors' Second Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 02/28/2025; D.I. [783](#)].
- D. Objection by the FME Entities to Debtors' Second Omnibus Motion for Entry of an Order Pursuant to Sections 105(a) and 365(a) of the Bankruptcy Code Authorizing the Debtors to Reject Certain Executory Contracts and Unexpired Leases [Filed: 03/04/2025; D.I. [817](#)].

Status: This matter has been resolved with respect to Access through a Stipulation with respect to rejection of the Access contracts, which stipulation has been approved by the Court at D.I. 1382. As to FME only, the Debtors and FME have agreed to continue this matter to August 14, 2025 at 11:00 a.m.

4. Application of Public Service Electric and Gas Company for Allowance and Immediate Payment of Administrative Expenses [Filed: 04/18/2025; D.I. [1191](#)].

Related Documents:

- A. Amended Application of Public Service Electric and Gas Company for Allowance and Immediate Payment of Administrative Expenses [Filed: 06/20/2025; D.I. [1355](#)].

Objection Deadline: July 1, 2025 at 4:00 p.m.

Responses:

- B. Debtors' Objection to Application of Public Service Electric and Gas Company for Allowance and Immediate Payment of Administrative Expenses [Filed: 05/09/2025; D.I. [1238](#)].

Status: The parties have agreed to continue this matter to August 14, 2025.

5. Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of K&L Gates LLP as Special Counsel for the Debtors, Effective as of the Petition Date [Filed: 05/14/2025; D.I. [1270](#)].

Related Documents: None.

Objection Deadline: May 28, 2025 at 4:00 p.m. The deadline was voluntarily extended to May 29, 2025 at 4:00 p.m. for the U.S. Trustee only.

Responses:

- A. Objection of the United States Trustee to Application of the Debtors for Entry of an Order Authorizing the Retention and Employment of K&L Gates LLP as Special Counsel for the Debtors, Effective as of the Petition Date [Filed: 05/29/2025; D.I. [1300](#)].

Status: The parties have agreed to continue this matter to August 14, 2025

6. Application of SCG Capital Corporation for Allowance of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(A) and Request for Immediate Payment [Filed: 05/16/2025; D.I. [1278](#)].

Related Documents: None.

Objection Deadline: May 30, 2025 at 4:00 p.m.

Responses:

- A. Debtors' Objection to Application of SCG Capital Corporation for Allowance of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(A) and Request for Immediate Payment [Filed: 05/30/2025; D.I. [1301](#)].
- B. Supplement to Application of SCG Capital Corporation for Allowance of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(A) and Request for Immediate Payment [Filed: 06/10/2025; D.I. [1325](#)].

Status: The parties have entered into a settlement agreement which provides, *inter alia*, that the Application is stayed. Accordingly, the parties are in agreement that the hearing on the Application should be continued to a date to be determined.

7. Motion of Frank Carine and Joanne Carine, His Wife for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Filed: 05/21/2025; D.I. [1281](#)].

Related Documents: None.

Objection Deadline: June 5, 2025 at 4:00 p.m. and extended to August 7, 2025 at 4:00 p.m.

Responses: None.

Status: The parties are working to resolve the Motion. This matter has been continued to August 14, 2025.

8. Motion of Access Information Management Corporation for Allowance and Payment of Administrative Expense Claims [Filed: 06/13/2025; D.I. [1346](#)].

Related Documents: None.

Objection Deadline: June 27, 2025 at 4:00 p.m. The deadline was voluntarily extended to July 2, 2025.

Responses:

- A. Objection of the Debtors to Motion of Access Information Management Corporation for Allowance and Payment of Administrative Expense Claims [Filed: 07/02/2025; D.I. [1386](#)].

Status: The parties have agreed that this matter should be continued.

**II. UNCONTESTED MATTERS WITH CERTIFICATE OF COUNSEL (COC)**

- 9.** The Estate of Gloria Johnson by Administrator Cherese Johnson's Motion for Relief from the Automatic Stay [Filed: 06/17/2025; D.I. [1349](#)].

Related Documents:

- A. Order Approving Stipulation Resolving the Estate of Gloria Johnson by Administrator Cherese Johnson's Motion for Relief from the Automatic Stay [Filed: 07/02/2025; D.I. [1384](#)].

Objection Deadline: July 1, 2025 at 4:00 p.m.

Responses: None.

Status: An Order has been entered. This matter will not go forward.

- 10.** Motion of Maple Healthcare, LLC for Entry of an Order Providing that the Administrative Claims Bar Date Does Not Apply to Certain Claims [Filed: 06/23/2025; D.I. [1361](#)].

Related Documents:

- A. Agreed Order Granting Motion of Maple Healthcare, LLC for Entry of an Order Providing that the Administrative Claims Bar Date Does Not Apply to Certain Claims [Filed: 07/02/2025; D.I. [1391](#)].

Objection Deadline: July 1, 2025 at 4:00 p.m.

Responses: None.

Status: An Order has been entered. This matter will not go forward.

**III. CONTESTED MATTERS GOING FORWARD**

- 11.** Amended Motion of VRC Companies, LLC (I) Requesting Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(B)(1)(A) and (II) Requesting an Order Directing the Debtors to Comply with 11 U.S.C. § 351 as to the Disposal of Patient Medical Records [Filed: 06/23/2025; D.I. [1363](#)].

Related Documents: None.

Objection Deadline: July 1, 2025 at 4:00 p.m.

Responses:

- A. Debtors' Objection to Amended Motion of VRC Companies, LLC (I) Requesting Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(A) and (II) Requesting an Order Directing the Debtors to Comply with 11 U.S.C. § 351 as to the Disposal of Patient Medical Records [Filed: 07/01/2025; D.I. [1378](#)].
- B. Reply in Support of the Amended Motion of VRC Companies, LLC (I) Requesting Allowance and Payment of Administrative Expense Claim Pursuant to 11 U.S.C. § 503(b)(1)(A) and (II) Requesting an Order Directing the Debtors to Comply with 11 U.S.C. § 351 as to the Disposal of Patient Medical Records [Filed: 07/03/2025; D.I. [1392](#)].

Status: **This matter has been continued to August 14, 2025.**

Dated: July 7, 2025

**DILWORTH PAXSON LLP**

/s/ Peter C. Hughes

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*Counsel for the Debtors*